

EXHIBIT A

Re: Sergeants Benevolent Association Health & Welfare Fund, et al. v. Actavis, PLC, et al. - Topics

1 message

Elizabeth Metcalf <emetcalf@safirsteinmetcalf.com>

Wed, Dec 4, 2019 at 3:58 PM

To: "Bave, William" <william.bave@whitecase.com>, "Chiappetta, Gina" <gina.chiappetta@whitecase.com>

Cc: Peter Safirstein <psafirstein@safirsteinmetcalf.com>, "Marvin A. Miller" <mmiller@millerlawllc.com>, "Lori A. Fanning" <lfanning@millerlawllc.com>, Sheila Feerick <sfeerick@safirsteinmetcalf.com>

Bill - Please provide a couple of proposed deposition dates for each of the Forest and Merz deponents listed in our Nov. 27 email.

Thank you,
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On Wed, Nov 27, 2019 at 3:34 PM Elizabeth Metcalf <emetcalf@safirsteinmetcalf.com> wrote:

Pursuant to Magistrate Judge Lehrburger's Oct. 11, 2019 Order (ECF No. 287), here are the topics on which Plaintiff seeks to question each witness:

Deposition Topics for Forest Deponents

Meury Topics

Discussions and relationship with Adamas Pharmaceuticals-

Development and implementation of marketing plan regarding Namenda XR – including, but not limited to internal discussions and discussions with PBMS, Long term Care facilities etc.

Forest's financial strategy regarding Namenda XR.

Discussions with John MacPhee

Discussions regarding MDV Partners

Review of Forest Compensation Policy

Dealings with CMS

Agovino Topics

Joint Defense Agreements

David Solomon Topics

Discussions Regarding Royalty Payments

Relationship with Adamas

Relationship with Dr. Reddy's

Relationship with Teva

Relationship with Amneal

Nikhil Topics

Discussions with Mertz regarding the pediatric extension

Deposition Topics for Merz Deponents

Philip Burchard

Discussions Regarding Royalty Payments

Discussions Regarding Adamas Pharmaceuticals including Mertz-Adamas lawsuit

Letters of Guaranty

Pediatric extension and autism study and agreement(s) re autism studies

Discussions with Forest re settling generic Namenda lawsuits including financial arrangements

Discussions with or concerning all generic defendants during the class period regarding supply or marketing agreements

Ursula Windschief

Pediatric extension and autism study and agreement(s) re autism studies

Topics for 3rd Party Discovery

Gregory Went

Forest/Merz relationship with Adamas Pharmaceuticals re Namenda franchise

Michael Chez

Pediatric Exclusivity

Martin Toto

Dual representation of Forest and Cobalt

Thanks,
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